

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONER

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Zakai Anderson # 096987
Full Name of Plaintiff Inmate Number

v.

Spartan Township Police Dept
Name of Defendant 1

Cory Allwein
Name of Defendant 2

Justin Fuller
Name of Defendant 3

Jonathan - Santana - Carnello
Name of Defendant 4

Beenie Rendler
Name of Defendant 5

(Print the names of all defendants. If the names of all defendants do not fit in this space, you may attach additional pages. Do not include addresses in this section).

Civil No. 1:24-CV-1688
(to be filled in by the Clerk's Office)

☐ Demand for Jury Trial
☐ No Jury Trial Demand

FILED
HARRISBURG, PA

OCT 03 2024

PER DA
DEPUTY CLERK

I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

- ☒ Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)
- ☐ Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

II. ADDRESSES AND INFORMATION

A. PLAINTIFF

Name (Last, First, MI)

Anderson Zakai

Inmate Number

Zakai Anderson 096987

Place of Confinement

Dauphin County Prison

Address

501 Mall Rd. Hous. Pa. 17111

City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

B. DEFENDANT(S)

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

Swatara Twp. Police Dept.

Name (Last, First)

Police Officer

Current Job Title

Swatara Twp. Police Dept / Steelton Police Dept.

Current Work Address

Steelton Pa. 17113

City, County, State, Zip Code

Defendant 2:

Cory ALLWEIN

Name (Last, First) Police officer

Current Job Title Swatara Twp. / Steelton PA.

Current Work Address Steelton Pa. 17113

City, County, State, Zip Code

Defendant 3:

Justin Fuller

Name (Last, First)

Current Job Title Same as Above

Current Work Address

City, County, State, Zip Code

Defendant 4:

Jonathon - Santana - Carabello

Name (Last, First)

Current Job Title SAME AS ABOVE

Current Work Address

City, County, State, Zip Code

Defendant 5:

Beverly Rendler

Name (Last, First)

Current Job Title Same as above

Current Work Address

City, County, State, Zip Code

III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

On 12-17-23 a Traffic Stop was conducted. Allegedly the Officers who conducted the stop suspected the Driver of the vehicle for making OR NOT using turning signal and turning into prohibited area. Plaintiff was eventually arrested

B. On what date did the events giving rise to your claim(s) occur?

12-17-2023

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?)

During the Traffic Stop I was a passenger in the vehicle. Officers essentially ask the driver of the car permission to search the vehicle after conducting a pat down on the vehicle's occupant. Eventually a weapon was discovered and I was charged with weapons offense and ultimately arrested.

IV. LEGAL CLAIM(S)

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

Issues: Officers violates my 4th Amendment right. I had no expectation in the vehicle and was in custody when Officers created a custodial environment. Therefore I assert I am being illegally detained as a result of false arrest. and The supposed evidence is fruit of a poisonous tree.

V. INJURY

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

I suffer from distress as a result of cruel and unusual punishment and negligence from officers conduct.

VI. RELIEF

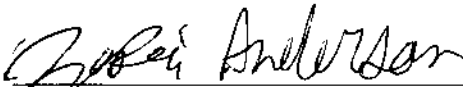
State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

I would like to request a settlement or sum of 2.5 million dollars.

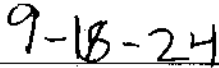
VII. SIGNATURE

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.



Signature of Plaintiff



Date